

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA, :

-against- :

NOTICE OF MOTION

MANSSOR ARBABSIAR, :

11 Cr. 897 (JFK)

GHOLAM SHAKURI, :

Defendants. :

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PLEASE TAKE NOTICE, that upon the annexed declarations of Sabrina P. Shroff, Esq., Michael B. First, M.D., Joel E. Morgan, PH.D., and Manssor Arbabsiar, and the accompanying Memorandum of Law, the undersigned will move this Court, before the Honorable John F. Keenan, United States District Judge for the Southern District of New York, 500 Pearl Street, New York, New York, at a time to be designated by the Court, to dismiss the Indictment or, in the alternative, to suppress, and granting such other and further relief as the Court deems just and proper.

Dated: New York, New York
July 16, 2012

DAVID E. PATTON, ESQ.

Federal Defenders of New York, Inc.
52 Duane Street - 10th Floor
New York, New York 10007
Tel.: (212) 417-8700

Attorney for Defendant
MANSSOR ARBABSIAR

By: 

Sabrina P. Shroff, Esq.

Sabrina P. Shroff, Esq.
Edward S. Zas, Esq.
Katherine M. Romano, Esq.

Of Counsel

TO: PREET BHARARA, ESQ.
United States Attorney
Southern District of New York
One St. Andrew's Plaza
New York, New York 10007
Attn.: EDWARD KIM, ESQ.
GLENN KOPP, ESQ.
Assistant United States Attorneys
Southern District of New York